## REMARKS

By this Amendment, claims 1-4, 6-11, and 13 are amended, new claims 14-16 are added, and claims 5 and 12 are canceled without prejudice to, or disclaimer of the subject matter found therein. Accordingly, claims 1-4, 6-11, and 13-16 are pending in this application. No new matter is added.

Applicants appreciate the courtesies shown to Applicants' representative by Examiner Diaz in the March 28 personal interview. Applicants' separate record of the substance of the interview is incorporated into the following remarks.

Claims 1, 3, 4, 6-11, and 13 are rejected under 35 U.S.C. §112, second paragraph. The rejection is respectfully traversed.

At the interview, Applicants' representative and the Examiner discussed how to overcome the §112 rejection. As discussed, the proposed amendments to the claims overcome the §112 rejection. It is respectfully submitted that the amendments are for proper antecedent basis and clarity only, and that the claims are not narrowed by such amendments. Accordingly, withdrawal of the §112 rejection is respectfully requested.

Claims 7-11 are rejected under 35 U.S.C. §101. The rejection is respectfully traversed.

At the interview, Applicants' representative discussed with the Examiner proposed amendments to claims 7-11 to overcome the §101 rejection. As agreed, the proposed amendments overcome the §101 rejection. Thus, withdrawal of the §101 rejection is respectfully requested.

Claims 1, 3, 4, 6-11, and 13 are rejected under 35 U.S.C. §102(e) over Stuart, U.S. Patent No. 6,466,935. The rejection is respectfully traversed.

At the interview, Applicants' representative discussed the differences between the features as recited in claims 1, 3, 4, 6-11, and 13 and the disclosure of Stuart. In particular,

Stuart fails to disclose the features of executive element management means for classifying executive elements into processible tasks and managing the classified executive elements, and selecting means for selecting out of the executive element classification and management means a candidate executive element that can process each of the tasks based on the classification, as recited in claims 1, 6, 9, and 13.

Stuart also fails to disclose classifying plural executive elements for executive tasks constituting in advance various services into processible tasks and managing the classified executive elements, each of the executive elements and including at least one of human and physical elements, analyzing by a processor, as instructed by the customer, tasks required for the specific service, and selecting by a processor from the executive elements classified and managed, on the basis of the results of the analysis, an executive element for executing the tasks based on the classification, as recited in claim 7.

Stuart further fails to disclose a first module for classifying the executive elements into processible tasks in advance and managing the classified executive elements, and a second module for searching the executive elements classified and managed for an executive element to execute each task required for a given service and selecting the executive element based on the classification, as recited in claim 10.

As discussed at the interview, Stuart's workflow management system is based on input/output relationships, i.e., what is done by each activity (process) according to the result of what activity (input from the preceding activity), and to what other activity that activity hands over its result (output to the succeeding activity) (col. 4, lines 37-55; Fig. 5; col. 9, lines 35-52). Applicants discuss this type of workflow system in the Background section of the application (page 1, lines 19-24). As further discussed in the Background section, "the conventional workflow generation support apparatus based on the IPO model, in which links among activities are derived from a preset context, involves another problem that the

generation of a work process for selecting a series of activities for accomplishing tasks in carrying out a project lacks flexibility. The presetting of the context causes still another problem that the detection of a new value chain, such as detecting a new linkage, is made difficult." (page 4, lines 7-12).

Stuart's input/output model (IPO model) is based on contextual relationships between the various tasks (Figs. 5 and 6). For example, at col. 9, lines 36-52, Stuart describes that in general, each box represents a Work Flow Manager step or queue. The Composing 500, Spooling 501, Printing 502, and Inserting 503 boxes represent steps that are performed by various Work Flow Managers. The queues may be referred to as DB2 states that represents inputs to subsequent steps or outputs from preceding steps. Note that the Print Queue 511 provides an output for the Composing step 500 as well as input to the Spooling step 501; the Insert Queue 512 provides an output for the Printing step 502 as well as an input into the Inserting step 503; the Reprint Queue 515 provides an output for the Inserting step 503 and an input to the Spooling step 501; and the Mailing Queue 513 provides an output for the Inserting step 503 and an input to the Billing Queue 514. Accordingly, Stuart's workflow management system is based on input/output model that uses contextual relationships between tasks to accomplish a project.

As discussed at the interview, the element organization support apparatus, element organization support method and storage medium recited in the claims at issue, on the other hand, do not use an IPO model or contextual relationship between the tasks for accomplishing a project (page 5, lines 4-15). In other words, the apparatus has an executive element management section for classifying each executive element into processible tasks and managing the executive elements, and a selecting section for selecting out of the executive element management section a candidate executive element that can process each of the tasks (page 4, line 27 to page 5, line 3).

An advantage is that this way of managing executive elements classified into possible tasks and selecting candidate executive elements with processible tasks as keys makes it possible, when any new executive element is to be added, to select candidate executive elements for accomplishing a project irrespective of the contextual relationships of the tasks and to add the new executive element easily without having to accomplish processing to maintain the context (page 7, lines 10-15). Stuart fails to perform this function as recited in claims 1, 6, 7, 9, 10, and 13.

As Applicants describe at page 5, lines 10-15, since candidate executive elements are selected with processible tasks as keys irrespective of the context, there is no need to cause input/output relationships among executive elements ensuing from addition, deletion or modification of executive elements in any database to be reflected in other databases even though executive elements are managed in a decentralized way and plural databases, resulting in efficient decentralized management (Fig. 2). As discussed at the interview, Stuart fails to perform this function because Stuart is based on an input/output relationship of the various tasks in order to accomplish a project, such as a printing project. Therefore, Stuart fails to disclose the features as recited in claims 1, 6, 7, 9, 10, and 13.

Because Stuart does not anticipate or suggest each and every feature of claims 1, 6, 7, 9, 10, and 13, Stuart cannot anticipate or suggest the subject matters of claims 2-4, which depend from claim 1, the subject matter of claim 8, which depends from claim 7, and the subject matter of claim 11, which depends from claim 10, at least for the reasons discussed with respect to claims 1, 6, 7, and 10 and for the additional features recited therein. Thus, as discussed at the interview, the pending claims are patentable over Stuart.

Rejoinder of claim 2 upon allowance of claim 1 is respectfully requested because claim 2 depends from claim 1 and claim 1 is generic to claim 2. Thus, claim 2 would be allowable for the same reasons that claim 1 is allowable.

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1-4, 6-11 and 13-16 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

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